

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

VIMALA LLC, dba ALECIA
and
ALECIA VENKATARAMAN,

Plaintiffs,

-vs-

WELLS FARGO BANK, N.A.;
WELLS FARGO MERCHANT SERVICES,
LLC; and FIRST DATA MERCHANT
SERVICES, LLC,

Defendants.

JURY DEMAND
No. 3:19-cv-00513

The video deposition of ALECIA VENKATERAMAN, a
witness in the above-entitled cause, taken before
Cynthia Odom, Licensed Court Reporter and Notary
Public in and for Davidson County, Tennessee, on the
24th day of August, 2020, commencing at 9:15 a.m.,
pursuant to the Tennessee Rules of Civil Procedure.



1 e-mail address, I just know it does appear in search
2 results within G-mail.

3 Q. And you'll note in the e-mail that you sent
4 to Ms. -- to Jessica, it says: The e-mail looks to be
5 sent from anjalitiwari@csr.wellsfargo.com; right?

6 A. Correct.

7 Q. So at least at that point in time in January
8 of 2019 you saw an e-mail that appeared to have been
9 sent from that e-mail address?

10 A. I saw e-mails that populated in a search
11 result for anjalitiwari@csr.wellsfargo.com. I did not
12 search individual e-mails to look at where those
13 addresses were coming from.

14 Q. Why were you searching e-mail addresses?

15 A. Pathway had suggested -- at this time they
16 were actively involved, they had suggested searching
17 the G-mail account for any Wells Fargo e-mail
18 addresses related to different variations of people
19 that I had remembered speaking to in hopes that we
20 could find potentially more people to reach out to and
21 locate the funds.

22 Q. Did you ever speak with someone named Liz
23 Harrington?

24 A. I believe so.

25 Q. How did you get in touch with Liz Harrington?

1 A. I visited a branch, I visited multiple
2 branches trying to locate the funds and find someone
3 that could assist me with getting the funds released.

4 Q. That doesn't really answer it; how did you
5 get to Ms. Harrington?

6 A. I went in and visited a branch.

7 Q. Was she in the branch?

8 A. Yes.

9 Q. Did you speak to her face-to-face?

10 A. I did.

11 Q. Did you receive a card?

12 A. I don't know if I received a card.

13 Q. Which branch did you meet Ms. Harrington at?

14 A. This particular -- this particular week
15 towards the end -- around the end of October, first
16 week in November, I visited the Wells Fargo branch
17 right next to Union Street downtown Nashville where
18 our office was. I also visited the West End branch,
19 again, in Nashville, Tennessee, downtown, I spoke with
20 individuals at both locations within that two-week
21 period and received -- then received an e-mail from
22 Liz Harrington.

23 Q. What branch was Ms. Harrington at?

24 A. I believe she was at the Union -- Wells Fargo
25 is at the cross street of Union Street, where our



1 offices were, I don't know the address of that Wells
2 Fargo, but I believe I met with her at that location.

3 Q. Did you take notes of that conversation?

4 A. I did not.

5 Q. Okay. Do you have any records to reflect
6 that you went in and met with a Ms. Harrington around
7 that timeframe?

8 A. I don't.

9 Q. So your testimony here today is you sat
10 face-to-face with Ms. Harrington?

11 A. I sat down face-to-face with someone working
12 at the Wells Fargo branch, and I believe her to be Liz
13 Harrington.

14 Q. Did she tell you her name when you met with
15 her?

16 A. I believe she told me her name and then I
17 received the e-mails, so the name, Liz Harrington,
18 stands out to me, but I don't recollect receiving a
19 business card of that individual I met with.

20 Q. Is it possible you could have met with
21 somebody else who -- and then received an e-mail from
22 Ms. Harrington?

23 A. It's possible.

24 Q. Did you review what are referred to as touch
25 reports that Wells Fargo produced to prepare for your

1 STATE OF TENNESSEE)
2) ss
3 COUNTY OF DAVIDSON)

4 I, CYNTHIA ODOM, Licensed Shorthand Reporter and
5 Notary Public duly and qualified in and for the State
6 of Tennessee do hereby certify there came before me
7 the deponent herein, namely ALECIA VENKATARAMAN, who
8 was by me duly sworn to testify to the truth and
9 nothing but the truth concerning the matters in this
10 cause.

11 I further certify that the foregoing transcript is
12 a true and correct transcript of my original
13 stenographic notes.

14 I further certify that I am neither attorney or
15 counsel for, nor related to or employed by any of the
16 parties to the action in which this deposition is
17 taken; and furthermore, that I am not a relative or
18 employee of any attorney or counsel employed by the
19 parties hereto or financially interested in the
20 action.

21 IN WITNESS WHEREOF, I have hereunto set my hand
22 and affixed my Notarial Seal this 24th day of August,
23 2020. *Cynthia Odom*

24 CYNTHIA ODOM,
25 NOTARY PUBLIC
TNLCR#: 487